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February 20, 2024

The Honorable Stephanie A. Gallagher  
United States District Court for the  
District of Maryland (Northern Division)  
101 West Lombard Street  
Baltimore, MD 21201

**RE: *Doreen Henry v. Terrance Hall, et al.*, Civil Case No. 1:23-cv-01285-SAG,  
Plaintiff's Status Update and Request for Scheduling Order**

Dear Judge Gallagher:

As the Court is aware, on or about December 7, 2023, Plaintiff filed a status update and simultaneous request for leave to file a Motion for Partial Summary Judgment (ECF No. 26). On or about January 4, 2024, following a telephone call with Your Honor's administrative assistant, counsel for Plaintiff were informed that no particular procedure was required for filing motions and that Plaintiff could proceed with filing her partial dispositive motion. However, upon further review and consideration, and in the interest of judicial economy, Plaintiff believes it would be most efficient – for the Court and the parties – to obtain a scheduling order and initiate the discovery process prior to the filing of a full dispositive motion against both Defendants, Terrance and Lisa Hall, so as to avoid the filing of multiple dispositive motions throughout the case.

Local Rule 104.4 provides that “[u]nless otherwise ordered by the Court or agreed upon by the parties, the conference of counsel required by Fed. R. Civ. P. 26(f) need not take place and discovery shall not commence and disclosures need not be made until a scheduling order is entered.” Pursuant to Local Rule 103.9, “[a]ll actions except ones which the presiding judge notifies the parties that he or she designates to be complex, e.g., antitrust, mass tort, patent infringement, RICO, and securities fraud actions in which all parties are represented by counsel, are exempted from the requirement of Fed. R. Civ. P. 16(b) that the Court consult with counsel (or unrepresented parties) or await a report from the parties under Fed. R. Civ. P. 26(f) before entering a scheduling order.”

Accordingly, Plaintiff respectfully requests the issuance of a scheduling order pursuant to Local Rules 103.9 and 104.4 or, if deemed necessary by the Court, a scheduling conference with Plaintiff's counsel and Defendants (who remain unrepresented by counsel to Plaintiff's

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knowledge) to discuss the appropriate schedule for this case and facilitate entry of a scheduling order.

Thank you for your attention to this matter and your consideration of this request.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Michael J. Marinello". The signature is fluid and cursive, with a large initial "M" and a stylized "J" and "M".

Michael J. Marinello

cc: Doreen Henry